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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA DOLORES MORALES BECERRA,
individually; CLARISSA BECERRA,
individually; RAYNA BECERRA,
individually; and RICHARD BECERRA, IN
HIS CAPACITY AS SPECIAL
ADMINISTRATOR FOR THE ESTATE OF
RAYMOND BECERRA, DECEASED;

Plaintiffs,

vs.

WALMART INC., a foreign business entity
dba WALMART; DOE INDIVIDUALS 1-10;
and ROE ENTITIES I-X, inclusive,

Defendants.

Case No.: 2:21-cv-02094-JCM-NJK

**JOINT MOTION TO EXTEND STAY OF
DEADLINES
[FOURTH REQUEST]**

Plaintiffs MARIA DOLORES MORALES BECERRA, CLARISSA BECERRA,
RAYNA BECERRA, and RICHARD BECERRA, IN HIS CAPACITY AS SPECIAL

1 ADMINISTRATOR FOR THE STATE OF RAYMOND BECERRA (hereinafter “Plaintiffs”)
2 and Defendant WALMART INC. d/b/a WALMART (hereinafter “Defendant” or “Walmart”), by
3 and through their respective counsel of record, do hereby jointly move the Court, in light of the
4 Parties’ settlement in principle of this matter, to stay all deadlines for an additional thirty (30)
5 days to finalize resolution of all matters in controversy in the above-referenced matter.

6 This is the fourth such request by either party to extend or modify the schedule. Good
7 cause exists because all matters in controversy between the Parties have been settled. The Parties
8 have exchanged settlement documents. Plaintiffs have signed the settlement and release
9 agreements, and Defendant has ordered the settlement checks.

10 The primary delay in finalizing settlement and dismissing the case appears to be related
11 to Walmart’s acceptance of Plaintiffs’ counsel’s W-9. Plaintiffs originally provided an unsigned
12 W-9 to Defendant, and Defendant requested a signed and dated W-9 instead. Plaintiffs provided
13 Defendant with a signed and dated W-9, but upon receipt, Defendant requested that Plaintiffs
14 provide a W-9 on the most recent 2018 IRS form. Plaintiffs have now provided Defendant with
15 an updated W-9 on the newest IRS form and hope that there are no further delays in receiving the
16 settlement checks.

17 The Parties are now waiting for the settlement checks to arrive so that they can be
18 exchanged for the signed releases and the case can be dismissed. The Parties believe that entry of
19 a temporary stay will promote judicial economy and preserve the Court’s resources. Accordingly,
20 the Parties respectfully request a 30-day stay for the above-referenced action, including any
21 hearings or deadlines, through August 18, 2022.

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Wherefore, the Parties respectfully request that the Court enter an order staying all deadlines in this matter for thirty (30) days, through August 18, 2022, with the parties to either file a dismissal of all claims or alternatively to file a status report with the Court within 30 days of the Court's order entering the stay.

DATED this 19th day of July, 2022.

DATED this 19th day of July, 2022.

BAY LAW PERSONAL INJURY

ALVERSON TAYLOR & SANDERS

/s/ Christian A. Miles

/s/ Kurt Bonds

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IT IS SO ORDERED:

DATED: July 25, 2022

James C. Mahan
UNITED STATES DISTRICT JUDGE



CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm BAY LAW PERSONAL INJURY, and that on this 19th day of July, 2022, I electronically served a copy of **JOINT MOTION TO EXTEND STAY OF DEADLINES [FOURTH REQUEST]** as follows:

☐ By facsimile addressed to the following counsel of record, at the address listed below;

☐ By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;

☐ By Hand Delivery (ROC); and/or

☒ By Electronic Service through CM/ECF to:

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/s/ Christian A. Miles

An employee of Bay Law Personal Injury

